

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON,  
ISSACCA POWELL, KEITH BURGESS, and  
TRAVIS BOYD on behalf of themselves and all  
similarly situated persons,

Plaintiffs,

V.

BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity and in his official capacity as the Jail Director of Shelby County, Tennessee; CHARLENE MCGHEE, in her individual capacity and in her official capacity as the Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; and TYLER TECHNOLOGIES, INC., a foreign corporation,

Defendants.

**Civil Action No. 2:16-cv-02907-SHM-  
tmp**

(Hon. Judge Samuel H. Mays)

**PLAINTIFFS' NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES TO  
DEFENDANT SHELBY COUNTY'S FIRST SET OF INTERROGATORIES AND FIRST  
SET OF REQUESTS FOR DOCUMENTS TO CORTEZ D. BROWN**

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, and Travis Boyd, on behalf of themselves and all other similarly situated persons, by and through their designated attorneys, and, pursuant to Local Rule 26.1(a)(2), provide this Notice that on **November 6, 2017** Plaintiffs served the following objections and responses to written discovery:

- Plaintiff Cortez D. Brown's Objections and Responses to Defendant Shelby County's First Set of Interrogatories and First Set of Requests for Documents.

Respectfully submitted,

s/ William E. Routt

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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that the above and foregoing was filed on November 6, 2017, using the CM/ECF system with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court to the following parties:

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s/ William E. Routt  
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